

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re TRANS UNION CORP. PRIVACY) Lead Case No. 00 cv 4729
LITIGATION) MDL Docket No. 1350
_____)
This Document Relates To:)
ALL ACTIONS.) Judge Robert W. Gettleman
) Magistrate Judge Michael T. Mason

**MOTION FOR LEAVE TO APPEAR
AND FILE MEMORANDUM IN OPPOSITION**

Class member John D. Harkey, Jr. respectfully moves this Court pursuant to Local Rule 5.6 for permission to appear for the limited purpose of filing the attached brief objecting to the discovery sought from him by class counsel and orally opposing such discovery at the hearing on Wednesday, April 14, 2010. In support of thereof, Mr. Harkey state as follows:

1. Mr. Harkey is a member of the settlement class.
2. On April 1, 2010, class counsel Dawn Wheelahan filed a Motion to Stay Disbursements, to Conduct Discovery With Respect to Demands for Payments for Individual Claims, and for Court Supervision of the Committee to Overseeing Disbursements from the Settlement Fund, Docket No. 749.
3. Through the motion, Ms. Wheelahan asks this Court to permit discovery concerning the post-settlements claims contemplated by Mr. Harkey and other class members.
4. Mr. Harkey seek leave to appear in this matter through counsel for the limited purpose of objecting to Ms. Wheelahan's discovery request, which affects him specifically.
5. A copy of Mr. Harkey's Response in Opposition to Motion to Conduct Discovery is attached as Exhibit A.

WHEREFORE, Mr. Harkey seek leave to appear in the above-referenced matter for the sole purpose of opposing the motion to conduct discovery from him and filing his attached response in opposition to such motion.

Dated: April 13, 2010

Respectfully submitted,

LOCKE LORD BISSELL & LIDDELL LLP

By: s/ Julie L. Young
Attorneys for John D. Harkey, Jr.

Rowe W. Snider
Julie L. Young
LOCKE LORD BISSELL & LIDDELL LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone: 312.443.0700
Fax: 312.443.0336

CERTIFICATE OF SERVICE

Julie L. Young, an attorney, hereby certifies that she caused the foregoing **MOTION FOR LEAVE TO APPEAR** to be served upon

Dawn Adams Wheelahan
5528 Loyola Avenue
New Orleans, Louisiana 70115

and counsel of record via the CM/ECF System on this 13th day of April, 2010.

s/ Julie L. Young

Rowe W. Snider
Julie L. Young
LOCKE LORD BISSELL & LIDDELL LLP
111 South Wacker Drive
Chicago, Illinois 60606
Phone: 312.443.0700
Fax: 312.443.0336